

**M. Christie Helmer**, OSB No. 743400  
chris.helmer@millernash.com  
**Jess G. Webster**, OSB No. 155330  
Jess.webster@millernash.com  
**Sanja Muranovic**, OSB No. 171774  
sanja.muranovic@millernash.com  
MILLER NASH GRAHAM & DUNN LLP  
3400 U.S. Bancorp Tower  
111 S.W. Fifth Avenue  
Portland, Oregon 97204  
Telephone: 503.224.5858  
Facsimile: 503.224.0155

**Keith B. Letourneau** (*Pro Hac Vice*)  
kletourneau@blankrome.com  
**Jeremy A. Herschaft** (*Pro Hac Vice*)  
jherschaft@blankrome.com  
BLANK ROME LLP  
717 Texas Avenue, Suite 1400  
Houston, Texas 77002  
Telephone: 713.228.6601  
Facsimile: 713.228.6605

Attorneys for Defendant Vigorous Shipping & Trading, S.A.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

PACIFIC GULF SHIPPING CO.,

Plaintiff,

v.

ADAMASTOS SHIPPING & TRADING  
S.A., VIGOROUS SHIPPING & TRADING,  
S.A., BLUE WALL SHIPPING LTD., and  
PHOENIX SHIPPING & TRADING S.A.,

Defendants.

No. 3:18-cv-02076-MO

DEFENDANT VIGOROUS SHIPPING &  
TRADING, S.A.'S SUPPLEMENTAL  
RESPONSE TO PLAINTIFF'S EMERGENCY  
MOTION TO EXTEND DEADLINE TO  
COMPLETE DEPOSITIONS

Subject to its restricted appearance, Vigorous Shipping & Trading, S.A. is submitting this Supplemental Response to Plaintiff's Emergency Motion to Extend the Deadline for Depositions to advise the Court that in response to Plaintiff's counsel's claimed unavailability this weekend, it has offered to present the two witnesses for depositions beginning Thursday at mid-day through end of day Friday, December 21, 2018. Also, regarding the location of the depositions, counsel for Vigorous Shipping has proposed holding the depositions at a hotel in Athens, Greece, and counsel for Plaintiff would prefer to make arrangements to have the depositions at a law firm office, which Vigorous Shipping does not oppose.

DATED: December 18, 2018.

MILLER NASH GRAHAM & DUNN LLP

s/ Sanja Muranovic

M. Christie Helmer, OSB No. 743400

chris.helmer@millernash.com

Jess G. Webster, OSB No. 155330

jess.webster@millernash.com

Sanja Muranovic, OSB No. 171774

sanja.muranovic@millernash.com

Telephone: 503.224.5858

Facsimile: 503.224.0155

BLANK ROME LLP

Keith B. Letourneau (*Pro Hac Vice*)

kletourneau@blankrome.com

Jeremy A. Herschaft (*Pro Hac Vice*)

jherschaft@blankrome.com

Telephone: 713.228.6601

Facsimile: 713.228.6605

Attorneys for Defendant

Vigorous Shipping & Trading, S.A.